

**UNITED STATES DISTRICT COURT
DISTRICT OF NEBRASKA**

TINA L. NICHOLS, an individual,)

Plaintiff,)

Case No. 8:19-cv-0035

V.)

FIRST DATA CORPORATION, a)

Delaware Corporation,)

JOINT STIPULATION TO STAY SCHEDULING ORDER DEADLINES

and $\gamma = 1$ and $\gamma = 0$ respectively. For $\gamma = 1$ the

JONES LANG LASALLE)

AMERICAS, INC., a Maryland)

Corporation)

Defendants.

COME NOW, the Parties,¹ Tina Nichols and First Data Corporation, in the above-captioned case, by and through their undersigned attorneys, and hereby request this Court to stay the current Scheduling Order deadlines in this matter in order to facilitate the parties finalizing settlement. In support of this Stipulation, the Parties state as follows:

1. The Court has issued a Scheduling Order, which requires the parties to file the Rule 26(f) report as well as exchange initial disclosures by December 27, 2019.
2. The parties have agreed to resolve this case and are in the process of finalizing settlement. Therefore, the Parties believe that it would better serve judicial economy to stay the current Scheduling Order deadlines and continue the trial date in order to facilitate the potential resolution of this case.

¹ Jones Lang Lasalle Americas, Inc. has been dismissed from this action without prejudice and, therefore, is not currently a party to this case.

3. The parties request that the Court schedule a status hearing with the parties or order the parties to move for an amended progression order on a date at least 60 days from the date of this filing to allow the parties to engage in settlement negotiations.

WHEREFORE, the Parties respectfully request this Court to enter an Order staying the current Scheduling Order deadlines.

DATED this 16th day of December, 2019.

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Counsel for Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of December, 2019, the above and foregoing **Joint Motion to Stay Scheduling Order Deadlines** was filed by the Court's CM/ECF system which served a copy upon counsel for Plaintiff via email:

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/s/ Cody E. Brookhouser-Sisney
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